

Exhibit “A”

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X
EDUARDO LI,

Plaintiff,

-against-

CERTAIN UNDERWRITERS AT LLOYD'S, LONDON,
AXIS SPECIALTY EUROPE SE;

Defendants-Petitioners.
----- X

Civil Action No.:

DECLARATION OF CRAIG DOWNEY

I, Craig Downey, declare as follows:

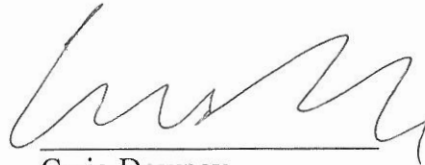
1. I serve as Vice President for professional lines claims for AXIS Specialty Europe SE, an insurer organized under Irish law with headquarters in Dublin, Ireland; and for AXIS Syndicate 1686, a Lloyd's syndicate whose managing agency is Asta Managing Agency Limited. AXIS Specialty Europe SE has been named as a defendant in this action.

2. I have reviewed the pleadings in this Action and submit this Declaration in support of Certain Underwriters at Lloyd's notice of removal of the foregoing case to the United States District Court for the Eastern District of New York, New York division.

3. The underwriters of Directors and Officers Legal Liability Policy No. LI1413318 ("Policy") issued to the Federation Internationale de Football Association (FIFA) are five Lloyd's syndicates, represented by their managing agents as follows: Brit Syndicates Limited for and on behalf of Syndicate 2987; Nexus Underwriting Ltd. for and on behalf of Syndicate 9860; Starr Financial Lines Consortium for and on behalf of Syndicate 9885; QBE for and on behalf of Syndicate 1886; and Asta Managing Agency Limited for and on behalf of Syndicate 1686.

4. AXIS Specialty Europe SE is not a subscribing underwriter of the Policy.

Signed under the pains and penalties of perjury on this 21st day of October 2015.



Craig Downey